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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' STATUS
CONFERENCE STATEMENT
REGARDING OBJECTION TO CLAIM
OF AMIR SHAHMIRZA AND KOMIR,
INC.**

[Related to Dkt. Nos. 12130, 13478, 13567]

Date: January 24, 2024

Time: 10:00a.m.

1 PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized
2 debtors (collectively, “PG&E,” the “Debtors” or the “Reorganized Debtors”) hereby submit
3 this statement in advance of the status conference to be held on January 24, 2024.
4

5 *1. Current Status of Case*

6 On December 26, 2023, the Court issued a Docket Text Order denying the Claimant’s
7 Second Motion for Partial Summary Judgment. The Court set forth its oral ruling during a
8 hearing on January 9, 2024. The Court set a further status conference to discuss future
9 scheduling on January 24, 2024, and directed the Parties meet and confer regarding scheduling.
10

11 *2. Discovery Schedule*

12 (1) The Parties have agreed to continue the deadline to complete expert
13 depositions to March 1, 2024 and have agreed that deposition notices
14 can be served in lieu of subpoenas.

15 a. Since December 4, 2023,¹ the Reorganized Debtors have
16 requested the following information in relation to expert
17 discovery:

- 18 i. Dates of availability for the deposition of Claimant’s expert, John
19 Mateo, based on the Mateo Appraisal Report.
- 20 ii. Dates of availability for the deposition of Mr. Amir Shahmirza as an
21 expert, based on the expert designation Claimant submitted.
- 22 iii. Identify the experts designated by the Reorganized Debtors that
23 Claimant desires to depose and proposed dates.

24 b. On January 22, 2024, Claimant proposed specific dates for expert depositions
25 in late March and April. Reorganized Debtors are in the process of meeting
26 and conferring on availability, but are agreeable to continue expert
27 depositions post March 1, 2024.

28 ¹ See email chain to L. Jacobson of January 18, 2024, attached as **Exhibit 1**.

1 c. Claimant proposed depositions of percipient depositions and documents.
2 Reorganized Debtors note that percipient witness discovery is closed per prior
3 stipulation and Court order, but Reorganized Debtors are in the process of
4 meeting and conferring regarding these recent proposals.
5

6 3. *Mediation*

7 (1) The Parties have agreed to mediate but have been unable to agree on a
8 date for mediation.

9 (2) Claimant's view of valuation for mediation, based on the Mateo expert
10 appraisal report, is substantially different from the Reorganized
11 Debtors' valuation for mediation, based on the Patton expert appraisal
12 report.

13 (3) Once the Parties have completed these expert depositions and are able
14 to test these divergent valuations, the Parties will be in position to
15 engage in meaningful mediation.

16 (4) The Reorganized Debtors have proposed a mutually agreeable mediator,
17 Brad Bening, who is available for mediation in April 2024.
18

19 4. *Trial*

20 a. If the Parties are unable to resolve this matter through mediation, the
21 Reorganized Debtors proposed setting a trial date in September 2024
22 or thereafter. Claimant has proposed a trial date in June.

23 b. Trial Counsel for the Reorganized Debtors presently has the
24 following unavailability:

25 i. March 4-22, 2024, TRIAL, *Digital Dolphin v Justin Cotton*,
26 Los Angeles Superior Court.

27 ii. April 16-May 2, 2024, TRIAL, *Sydowski v. PG&E*, San
28 Luis Obispo Superior Court.

1 iii. July 8-August 8, 2024, TRIALS, *King/Shull/Wasdin v. PJ*
2 *Helicopters/PG&E* (consolidated trials), San Francisco
3 Superior Court.

4 iv. August 8-August 23, 2024, *CSAA v. SUNRUN/PG&E*
5 (consolidated trials) Santa Clara Superior Court.
6
7

8 Dated: January 23, 2024

9 KELLER BENVENUTTI KIM LLP
10 ROVENS & LAMB LLP
11 LAW OFFICES OF JENNIFER L. DODGE,
12 INC.

13 /s/ Steven A. Lamb
14 Steven A. Lamb
15 Attorneys for Debtors and
16 Reorganized Debtors
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